

Exhibit U

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03-MD-1570 (GBD)(FM) ECF Case
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This document relates to:

Ashton, et al. v. Al Qaeda Islamic Army, et al. No. 02-CV-6977
Burnett, et al. v. Al Baraka Investment & Development Corp., et al., No. 03-CV-5738
Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al., No. 04-CV-05970
Euro Brokers v. Al Baraka Investment and Development Corp., et al., No. 04-CV-7279
Estate of O'Neill, et al. v. Al Baraka Investment and Development Corp., et al., No. 04-CV-1923
Federal Insurance Col, et al. v. Al Qaida, et al., No. 03-CV-6978

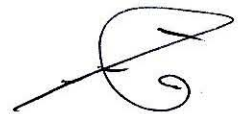
DECLARATION OF IBRAHIM SULAYMAN ADBULLAH

I, Ibrahim Sulayman Abdullah, being duly sworn, hereby declare under penalty of perjury that the following is true and correct:

1. I am not a party in the above captioned matter.
2. I am a citizen of Saudi Arabia.
3. I have a Bachelor's of Science degree in Industrial Engineering from King Abdul-Aziz University, Jeddah, Saudi Arabia; a Master's Degree in Computer Science from The George Washington University, Virginia, United States (1991 - 1994); and a Ph.D. in Information Technology from George Washington University, Virginia, United States (1999-2004). Between my Master's degree and my Ph.D. (1994-1999), I travelled back and forth between the United States and Saudi Arabia.
4. I first learned about the World Assembly of Muslim Youth, USA ("WAMY USA"), also known as WAMY International, in 1992, while studying at George Washington University during my Master's program. I attended some of WAMY's camps, religious

and social programs. They were all educational, teaching about self-development, Islamic awareness, and Islamic teachings.

5. Upon my return to the United States in 1999, Abdullah Bin Laden was a volunteer Director of WAMY USA. However, he was leaving and requested I take over his position as the volunteer WAMY USA Director.
6. I accepted the request and decided to join WAMY USA in an official capacity solely because of WAMY's objectives of helping the Muslim community.
7. After three months at WAMY USA, I took over from Abdullah Bin Laden and became a volunteer Director of WAMY USA. I was the Director for WAMY USA from 1999-2004.
8. When I took over as Director of WAMY USA, the office already had bank accounts set up, so I did not have to open any bank accounts. While I was at WAMY USA, the chapter banked with Bank of America.
9. My initial four to six months at WAMY USA, I focused on getting the office running. During this period, WAMY USA had no funds. Consequently, it had no employees and undertook no activities.
10. Gradually, I started sending plans for different projects to WAMY headquarters in Saudi Arabia and started receiving funds for the projects. Once we had activities going again, I hired a secretary to assist with the office. I also used some of the funds to print WAMY publications, pay for office expenses, and expenses associated with camp projects and educational programs.



11. Thereafter, WAMY Saudi Arabia would send funds for different WAMY USA projects, predominantly camp, sport programs, and printing of publications. The funds were sent twice a year.
12. WAMY USA did not undertake any fundraising activities; all funding came from WAMY Saudi Arabia.
13. Once funds were readily available, in addition to relying on our volunteers, we hired a few employees to work on the summer youth lecture activities, which encompassed educational, training, and religious activities.
14. WAMY USA also funded a few mosque building projects but not many.
15. Some of the Imams and staff from Dar Al-Hijrah mosque, Falls Church, Virginia, attended WAMY USA's religious and educational programs.
16. After the September 11, 2001 attacks, I was informed that a Dar Al-Hijrah staff member, Anwar Aulaqi, was associated with the hijackers.
17. Anwar Aulaqi was an Imam who had given speeches at Dar Al-Hijrah mosque during Friday prayers. I had no personal contact or relationship with Imam Aulaqi, other than hearing him speak during prayers at Dar Al-Hijrah.
18. WAMY USA did not fund any organizations or assist with any projects in Chicago, Illinois. It never funded or assisted the Institute of Islamic Information and Education or Monathammat El Birr A Doualia known as Benevolent International Foundation ("BIF"). I never heard of BIF until this lawsuit was filed.
19. When I joined WAMY USA in 1999, WAMY Canada was already in existence.
20. Upon information and belief, WAMY Canada was established through WAMY USA upon recommendation from WAMY Saudi Arabia.



21. WAMY USA received the comprehensive budget for North America operations from WAMY Saudi Arabia. WAMY USA then divided the funds according to the budget and operations for both WAMY USA and WAMY Canada.
22. WAMY Canada was required to submit its project proposals to WAMY USA. If the projects were small, WAMY USA would approve them and fund them directly. If the projects were large, WAMY USA would send the proposal to Riyadh for approval by WAMY Saudi Arabia.
23. WAMY Canada received its monthly budget monies from WAMY USA. This money funded WAMY Canada's activities, which included educational programs, lectures, financial assistance to Muslim youth, funding for Muslim activities, donations to food and clothing banks, and financial assistance to help improve Muslim communities.
24. During the early years of my tenure as the Director of WAMY USA, I had a difficult time with WAMY Canada.
25. In 2000, I asked Mohamad Al Khatib to serve as the volunteer Director of WAMY Canada. I thought he was a good person with no ill intentions. I knew, however, that in 1999, Abdullah Bin Laden had terminated Mr. Al Khatib due to his poor organizational skills and lack of reporting back. Nonetheless, I never thought Mr. Al Khatib would do anything that would put WAMY at risk; hence I asked him to come serve WAMY Canada.
26. While Mr. Al Khatib was the Director of WAMY Canada on a voluntary basis, he was the only person with whom I worked.
27. Soon after retaining Mr. Al Khatib, I got to experience his bad organizational skills that initially resulted in his 1999 termination by Abdullah Bin Laden. He would not report

back on his activities nor provide explanations for how funds were spent. Additionally, instead of contacting WAMY USA for WAMY Canada's budget, he would attempt to contact WAMY Saudi Arabia directly. WAMY USA and WAMY Saudi Arabia directed him on several occasions to contact WAMY USA for WAMY Canada's funding, to no avail.

28. As a result of his failure to report back, in or around 2000, WAMY USA stopped sending funds to WAMY Canada.

29. Later on, I do not recall the date, I became aware that Mr. Al Khatib had complained to WAMY Saudi Arabia that WAMY USA was not funding WAMY Canada projects. However, he never explained to WAMY Saudi Arabia that the reason compelling WAMY USA to withhold the funds was WAMY Canada's failure to report back.

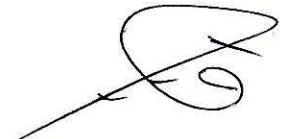
30. Mohamad Al Khatib never visited WAMY USA, and I never visited WAMY Canada.

31. In early March 2001, I learned that Mohamad Al Khatib, while representing WAMY Canada, was wearing many hats and was confusing the public which organization he was representing. I heard, for instance, he was representing the Muslim World League ("MWL") and confusing the two organizations when he spoke to people and conducted activities.

32. Therefore, I communicated this to WAMY Saudi Arabia via a letter addressed to Dr. Saleh Baeber because it was wrong of Mr. Al Khatib to represent other organizations while representing WAMY or to fundraise for other organizations.

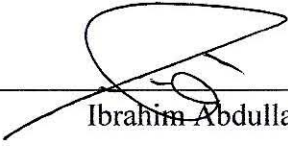
33. Upon this complaint, WAMY Saudi Arabia requested that I ask Mr. Al Khatib to resign.

34. On March 17, 2001, I sent a letter to Mohammed Al Khatib asking him to resign. On March 20, 2001, Al Khatib resigned from WAMY Canada.

A handwritten signature in black ink, consisting of a stylized 'S' followed by a horizontal line and a small loop.

35. While at WAMY USA, I was un-aware that Mohamad Al Khatib had deposited non-WAMY funds into WAMY Canada's accounts. I was not aware that he was also representative of BIF. I was equally unaware that he had opened sub-accounts for other organizations under WAMY Canada's bank accounts. I discovered this in this litigation.
36. As the Director of USA to whom WAMY Canada reported, I would never have permitted a WAMY bank account to be used for any other organization, nor should WAMY Canada have permitted this to happen.
37. Soon after Mohamad Al Khatib's resignation, I asked Talhah Al Jarad to serve as a volunteer Director for WAMY Canada.
38. Talhah Al Jarad was a great Director. He submitted WAMY Canada's project reports on a regular basis and accounted for all funds sent to WAMY Canada. I was very satisfied with Mr. Al Jarad's performance at WAMY Canada.
39. I started sending funds to Al Jarad to conduct WAMY operations.
40. In 2004, I sent WAMY Saudi Arabia my resignation letter, because I had completed my academic Ph.D. period and was planning to return to Saudi Arabia.

Dated: March, 29, 2018


Ibrahim Abdullah

Sworn to before me this _____
day of _____, 2018.

Notary Public